

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)
)
Revision of the Commission's Rules)
'To Ensure Compatibility with)
Enhanced 911 Emergency Calling Systems)
)
Phase II Compliance Deadlines for Non-)
Nationwide CMRS Carriers)

CC Docket No. 94-102 **RECEIVED**

NOV 18 2002

Federal Communications Commission
Office of the Secretary

November 1, 2002 Quarterly Report

**QWEST WIRELESS, LLC AND TW WIRELESS, LLC
NOVEMBER 1, 2002 PHASE II IMPLEMENTATION REPORT**

Introduction and Summary

Qwest Wireless, LLC and TW Wireless, LLC (collectively, "Qwest Wireless") submit this first quarterly E911 Phase II Implementation Status Report, and appended Affidavit, as required by the Federal Communications Commission ("FCC" or "Commission") *Stay Order* released July 26, 2002.² In that *Order*, the Commission granted extensions of E911 Phase II network upgrade and interim handset deployment deadlines to Tier II and Tier III wireless carriers

¹ This filing is submitted on behalf of both Qwest Wireless, LLC and TW Wireless, LLC. Together these companies form a joint venture in which Qwest Wireless, LLC holds a majority equity and sole controlling ownership interest. This joint venture provides broadband Personal Communications Services ("PCS") in a number of markets.

² *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems – Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, Order to Stay*, CC Docket No. 94-102, FCC 02-210 (rel. July 26, 2002) ("*Stay Order*").

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In the *Stay Order*, the Commission established quarterly reporting requirements for affected carriers, with the first report being due November 1, 2002.³ The purpose of these reports is to provide specific and verifiable information to the Commission so that it can better monitor Tier II carriers' progress on E911 wireless deployment. The reports will also allow the Commission to assess whether carriers are in compliance with the *Stay Order's* benchmarks and other applicable provisions of the E911 rules.⁴ Below Qwest Wireless provides the information the Commission seeks

Status of Pending Phase I and Phase II Requests

The Commission asks for a status report regarding all pending Phase I and Phase II requests.⁵ Attached as Appendix A, Qwest Wireless provides information, in a chart form, of the status of its various wireless E911 activities. No valid Public Service Answering Point ("PSAP") request received by Qwest Wireless has been pending for more than **six** months

Qwest Wireless treats PSAP requests as "valid" if they do not, on their face, fail to include critical information. To date, Qwest Wireless has not requested the supporting readiness documentation provided for in Section 20.18(j) of the Commission's rules.⁶ Thus, PSAPs representing that they will be capable of receiving and utilizing the data elements associated with the respective E911 service (Phase I or Phase II) are taken at their word and Qwest Wireless

³ *Id.* n.45.

⁴ *Id.* ¶ 31.

⁵ *Id.* ¶ 29

⁶ 47 C.F.R. § 20.18(j). Generally, PSAP requests contain statements that the PSAP has ordered necessary E911 equipment and has commitments from **suppliers** to have **the** equipment installed and operational within six months, and that the PSAP is communicating with its local exchange carriers ("LEC") for necessary trunking and other facilities. Alternatively, for Phase II requests, PSAPs sometimes will state that they are using a Non-Call Path Associated Signaling ("NCAS")

proceeds with deployment in good faith.

PSAP's Compliance with Conditions Necessary for a Valid E911 Request

The Commission asks carriers to identify questions or concerns they might have “concerning a PSAP’s compliance with the conditions necessary for a valid Phase I or II request, such as its readiness to receive and utilize Phase I or Phase II information.”⁷ Qwest Wireless does have some concerns around this issue.

As stated above, Qwest Wireless has opted to treat PSAP requests that are not facially invalid as valid requests and puts those requests in a deployment queue. That queue is structured to meet the Commission’s mandated six-month deployment timeframe

Despite the original appearance of a PSAP request as “valid” and its placement in a deployment queue, in some cases the actual readiness of a PSAP to receive wireless E911 service is later called into question. The problem encountered by the PSAP might be associated with technical issues such as Customer Premises Equipment or Selective Router capabilities. In these cases, Qwest Wireless works directly with the PSAP to craft a solution to the identified problem.

Other times, the PSAP’s difficulty in proceeding stems from its inability to resolve outstanding issues between it and its service LEC to the PSAP’s satisfaction. Qwest Wireless does not become involved in these discussions. However, during the course of these negotiations Qwest Wireless is sometimes informed that a PSAP has not followed through with the predicate ordering activities for them to be capable of receiving and utilizing the data elements associated with wireless E911 services, as provided for in Section 20.18(j) of the rules.⁸

technology and that they are making arrangements with their serving LEC for Automatic Location Information (“ALP”) database upgrades.

⁷ *Slay Order* ¶ 29.

⁸ 47 C.F.R. § 20.18(j); Letter from Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau, to Marlys Davis, King County, Washington, dated May 7, 2001, *affd on recon.*, 17 FCC

While the reasons for a delay in PSAP readiness might stem from a variety of reasons, the adverse consequence for Qwest Wireless is generally the same. Qwest Wireless will have been working to meet a six-month deployment requirement and the PSAP will not be positioned to receive the E911 information within the six months. While this particular PSAP turns out not to be ready to ~~turn~~ up E911 wireless service, a PSAP further down the queue may in fact be ready.

Qwest Wireless' E911 deployment strategy seeks to accommodate these tensions. Qwest Wireless continues to work toward making its network Phase 11-capable ready as it works each PSAP request. Should something occur that causes a PSAP to fall behind with respect to its readiness to receive wireless E911 information -- be it budget concerns beyond the PSAP's control or stalled negotiations with LECs -- Qwest Wireless persists in its wireless E911 deployment activities with respect to that PSAP. It then moves on to the next PSAP in queue. When the first PSAP is ready to get "back on track," Qwest Wireless' approach allows it to shift back to final deployment activity for the first PSAP in hopes of meeting **the** originally-scheduled six-month deployment requirement. This two-tiered deployment approach allows both Qwest Wireless and affected PSAPs to enjoy more efficient and effective deployment processes for wireless E911 than would be the case if Qwest Wireless required a non-ready PSAP to move out of queue and begin the request process all over again.

Rcd. 14789(2002); *see also* Letter from Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau, to Kathleen B. Levitz, BellSouth Corporation, in CC Docket No. 94-102, dated October 28, 2002 (affirming PSAPs' obligation to pay for LEC upgrades).

Handset Based Solution Benchmark Status

The handset benchmarks the Commission articulated in its *Stay Order* begin in calendar year 2003. Those benchmarks require that Tier II wireless carriers “begin selling and activating” ALI-capable handsets by March 1, 2003, and then proceed to mandate percentage penetration requirements into calendar years 2004-05.

Qwest Wireless intends to begin selling Assisted Global Positioning Systems (“AGPS”) handsets before March 1, 2003 and, thus, expects that it will beat the Commission’s initial benchmark. Many PSAPs in Qwest Wireless’ markets will be ready to receive and utilize Phase II data prior to Qwest Wireless’ selling ALI-capable handsets. At the time such handsets begin to be sold and activated, then, customers purchasing them will be able immediately to benefit from the Phase II functionality built into the handsets. Based on current vendor representations, Qwest Wireless anticipates it will also be able to meet the future handset penetration benchmarks. as well.

In addition, Qwest Wireless has implemented new hardware in its network to support Phase II deployments. Qwest Wireless participated in an end-to-end First Office Application trial with a Colorado Springs PSAP to determine compliance with the OET Bulletin 71 Guidelines. This work was done to determine the overall processing and accuracy for future Phase II deployments. The results of this trial were very encouraging. In light of the positive results, Qwest Wireless is now accumulating cell site information necessary for actual Phase II deployment and loading this information into its commercial network. The First Office Application Trial also indicates that Qwest Wireless will be able to meet the Commission’s

accuracy requirements by providing the location **fix** of an ALI-capable handset within 50 meters
67% of the time, and within 150 meters 95% of the time.

Respectfully submitted,

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November 1, 2002

APPENDIX A

Current Deployments

<u>PSAP</u>	<u>Date</u> Received	<u>Request Type</u>	<u>Targeted</u> <u>employer</u>	<u>Comments</u>
			Month/Year	
Casper County, WY	05/03/02	Valid Phase I	11/02	PSAP has communicated cost recovery in place, but there is not currently a wireless 911 surcharge legislated. High potential that this may go to suspend status.
Scottsbluff County, NE	07/22/02	Valid Phase I	01/03	
Fremont County, NE	08/06/02	Valid Phase I	02/03	
Pinal County, AZ	10/08/02	Valid Phase I	04/03	
Cowlitz County, WA	05/05/02	Valid Phase I	02/03	County requested suspend due to budget issues and taken out of suspend status on 09/02.
Thurston County, WA	10/11/01	Valid Phase I	02/03	County requested suspend due to budget issues and taken out of suspend status on 09/02.
Lewis County, WA	10/17/01	Valid Phase I	02/03	County requested suspend due to budget issues and taken out of suspend status on 09/02.
Jefferson County, WA	03/11/00	Valid Phase I	32/03	County requested suspend due to budget issues and taken out of suspend status on 09/02.
Columbia County, WA	04/25/02	Valid Phase I	02/03	County requested suspend due to budget issues and taken out of suspend status on 09/02.
Clark County, WA	07/16/01	Valid Phase I	02/03	County requested suspend due to budget issues and taken out of suspend status on 09/02.

City of Aurora, CO	09/03/02	Valid Phase I	03/03	
El Paso/Teller County, CO	04/12/01	Valid Phase II	11/02	Phase II First Office Application. Deployment and testing was delayed at first due to QW vendor issues. Testing started in 01/03 and awaiting E2 purchase from PSAP. Tariff should be approved 11/21/02 by PUC. E2 ordering can also be purchased via contract, however county has elected to order via tariff.
Summit County, CO	05/14/01	Valid Phase II	12/02	Awaiting E2 purchase from PSAP. PSAP chose tariff purchase. Tariff should be approved 11/21/02 by PUC.
Golden County, CO	07/09/01	Valid Phase II	12/02	Awaiting E2 purchase from PSAP. PSAP chose tariff purchase. Tariff should be approved 11/21/02 by PUC.
Arapahoe County, CO	10/23/01	Valid Phase II	12/02	Awaiting E2 purchase from PSAP. PSAP chose tariff purchase. Tariff should be approved 11/21/02 by PUC.
Summit County, CO	04/01/02	Valid Phase II	01/03	Awaiting E2 purchase from PSAP. PSAP chose tariff purchase. Tariff should be approved 11/21/02 by PUC.
Eagle County, CO	03/03/02	Valid Phase II	01/03	Awaiting E2 purchase from PSAP. PSAP chose tariff purchase. Tariff should be approved 11/21/02 by PUC.
City and County of Denver, CO	06/27/02	Valid Phase II	02/03	Awaiting E2 purchase from PSAP. PSAP chose tariff purchase. Tariff should be approved 11/21/02 by PUC.

King County, WA	10/26/02	Valid Phase II	13/03	Tariff was submitted on 10/10/02 with effective date of 11/15/02.
Lewis County, WA	10/17/02	Valid Phase II	13/03	Tariff was submitted on 10/10/02 with effective date of 11/15/02.
Anoka County, MN	04/12/01	Valid Phase II	11/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Brookland Center, MN	04/12/01	Valid Phase II	11/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Carver County, MN	14/12/01	Valid Phase II	11/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Chisago County, MN	04/12/01	Valid Phase II	11/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.

Dakota County, MN	04/12/01	Valid Phase II	01/03	existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Eden Prairie, MN	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Edina, MN	04/12/01	Valid Phase II	11/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Gladstone, MN	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Hennepin County, MN	04/12/01	Valid Phase II	1/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.

Maplewood, MN	04112101	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Aero Airport, MN	04112101	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Milwaukee, MN	04112101	Valid Phase II	31103	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Minneapolis, MN	04112101	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Minnetonka, MN	04112101	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.

Minnesota State Patrol	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Ramsey County, MN	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
Santiam County, MN	04/12/01	Valid Phase II	31/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
St. Louis Park, MN	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.
St. Paul, MN	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.

White Bear Lake, MN	04/12/01	Valid Phase II	01/03	Phase I deployment was implemented with WID box that is not Phase II compliant. Part of this deployment is migrating existing Phase I off of WID box to N-CAS solution. E2 ordering is available today.

Suspend Status PSAPs

<u>PSAP</u>	<u>Date Received</u>	Request Type	<u>Targeted</u>	<u>Comments</u>
			<u>or</u>	
			<u>it</u>	
Ada County, ID	04/03/01	Phase I	N/A	County does not have a cost recovery mechanism in place. PSAP refuses to deploy unless QW implements 911 for wireless which current state law does not cover (only wireline 911 surcharge addressed).
Dawson County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county
Hamilton County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Howard County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Derrick County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Murray County, UT		Phases I and II	N/A	PSAP does not have necessary equipment to support either P1 or P2.
Pennington County, SD		Phases I and II	1/02 (Phase I only)	County has not agreed to purchase Phase I equipment from LEC. County working with LEC to purchase without tariff. Per PSAP, Phase II capability at selective router is not available from LEC.
Spokane County, WA		Phase I	1/02	PSAP has not approved call routing or addressing. Once PSAP approves, testing and tun-up will begin.
Spokane County, WA		Phase I	1/02	Waiting for PSAP to sign contract. All facilities are in place and drive testing completed.

Chase County, NE	18/06/02	Phase I	N/A	QW does not have coverage in county.
Washington County, NE	07/15/02	Phase I	N/A	QW does not have coverage in county.
Washington County, OR	16/21/00	Phase I	N/A	PSAP refuses to accept address information. Not considered a valid request.
Island County, WA	06/20/01	Phase I	11/02	County requested suspension due to PSAP budget issues. Taken out of suspend status and targeted deployment for 10/02. On date of turn-up, issue identified with LEC information digit (7-digit router) not being provisioned correctly. Will attempt to resolve issue and targeting 11/02 deployment. If requested to order new circuits due to PSAP configuration change, deployment could be delayed until 12/02.

PSAP	Date Deployed
Adams County, CO	06/98
Arapahoe County, CO	03/00
Boulder County, CO	12/99
City and County of Denver, CO	09/98
Douglas County, CO	02/00
Eagle County, CO	05/00
Gilpin County, CO	02/00
Jefferson County, CO	03/00
Larimer County, CO	09/99
Summit County, CO	02/00
El Paso/Teller County, CO	08/00
Weld County, CO	09/99
Douglas County, NE	08/02
Sarpy County, NE	08/02
Benton County, OR	04/02
Clackamas County, OR	01/02
Columbia County, OR	01/02
Lane County, OR	04/02
Linn County, OR	04/02
Marion County, OR	01/02
Multnomah County, OR	01/02
Yamhill County, OR	10/02
King County, WA	02/02

Snohomish County, WA	09/02
Pima County, AZ	06/00
Pottawattamie County, IA	05/02
Anoka County, MN	05/99
Brookland Center, MN	05/99
Carver County, MN	05/99
Chisago, MN	05/99
Dakota County, MN	05/99
Eden Prairie, MN	05/99
Edina, MN	05/99
Gladstone, MN	05/99
Hennepin County, MN	05/99
Maplewood, MN	05/99
Metro Airport, MN	05/99
Milwaukie, MN	05/99
Minneapolis, MN	05/99
Minnetonka, MN	05/99
State Patrol, MN	05/99
Ramsey County, MN	05/99
Santiam County, MN	05/99
St. Louis Park, MN	05/99
St. Paul, MN	05/99
White Bear Lake, MN	05/99

APPENDIX B

AFFIDAVIT

I, Annette M. Jacobs, Executive Vice President and President - Consumer Markets Group, have read the attached Qwest **Wireless** Quarterly Report required by the Federal Communications Commission. I attest, under the penalty of perjury, that it is true and correct to the best of my knowledge.

/s/

November 1, 2002

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **QWEST WIRELESS, LLC AND TW WIRELESS. LLC NOVEMBER 1,2002 PHASE II IMPLEMENTATION REPORT** to be 1) tiled with the FCC via the electronic address of E911compliancereports@fcc.gov; 2) served via email on the FCC's duplicating contractor; and 3) served via first-class United States Mail, postage pre-paid, and/or email as indicated on the parties identified on the attached list.

Richard Crozier
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November 1.2002

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